

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

v.

Plaintiff,

2023 SLP - b P 12:45

Case No. 22-CR-91
[18 U.S.C. §§ 1591(a)(1), 1591(b)(1),
1591(b)(2), 1591(c), & (d); 1952(a)(3), &
2422(a)]

MONTAE D. JACOBS,
A.K.A. "MAX," "CHEDDAR," "MILLY,"

Defendant.

SUPERSEDING INDICTMENT

COUNT ONE
(Sex Trafficking by Force, Fraud, or Coercion)

THE GRAND JURY CHARGES THAT:

Beginning in approximately March 2019, and continuing through on or about January 24, 2022, in the State and Eastern District of Wisconsin,

MONTAE D. JACOBS, A.K.A. "MAX," "CHEDDAR," "MILLY,"

in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means AV-1, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause AV-1 to engage in commercial sex acts.

In violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

COUNT TWO
(Sex Trafficking by Force, Fraud, or Coercion)

THE GRAND JURY FURTHER CHARGES THAT:

Beginning in approximately April 2021, and continuing through approximately April 2022, in the State and Eastern District of Wisconsin,

MONTAE D. JACOBS, A.K.A. "MAX," "CHEDDAR," "MILLY,"

in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means AV-2, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause AV-2 to engage in commercial sex acts.

In violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

COUNT THREE
(Sex Trafficking of a Child)

THE GRAND JURY FURTHER CHARGES THAT:

Beginning in approximately December 2020, and continuing through approximately August 2021, in the State and Eastern District of Wisconsin,

MONTAE D. JACOBS, A.K.A. "MAX," "CHEDDAR," "MILLY,"
in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means JV-1, having had a reasonable opportunity to observe JV-1, and knowing and in reckless disregard that JV-1 had not yet attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), and 1591(c).

COUNT FOUR
(Obstruction and Interference with Sex Trafficking Enforcement)

THE GRAND JURY FURTHER CHARGES THAT:

Beginning on or about June 2, 2021, and continuing through on or about May 9, 2022, in the State and Eastern District of Wisconsin,

MONTAE D. JACOBS, A.K.A. "MAX," "CHEDDAR," "MILLY,"

did knowingly obstruct, attempt to obstruct, interfere with, and prevent the enforcement of Title 18, United States Code, Section 1591.

In violation of Title 18, United States Code, Section 1591(d).

COUNTS FIVE THROUGH THIRTEEN
**(Use of the Mail and Facilities in Interstate Commerce to
Promote, Manage, Establish, and Carry On an Unlawful Activity)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates set forth below, in the State and Eastern and Western Districts of Wisconsin and elsewhere,

MONTAE D. JACOBS, A.K.A. "MAX," "CHEDDAR," "MILLY,"

used the mail and facilities in interstate commerce with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, a business involving prostitution in violation of Wisconsin Statutes 944.30 through 944.34, and thereafter performed and attempted to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of such unlawful activity.

Count	Date	Mail or Facility in Interstate Commerce	Recipient
5	10/3/21	United States mail	AV-3
6	10/12/21	United States mail	AV-3
7	10/18/21	United States mail	AV-3
8	11/7/21	United States mail	AV-3
9	11/10/21	United States mail	AV-3
10	11/21/21	United States mail	AV-3
11	3/8/23	United States mail	AV-4
12	3/13/23	Internet	AV-4
13	3/15/23	United States mail	AV-4

Each in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT FOURTEEN
(Coercion and Enticement)

THE GRAND JURY FURTHER CHARGES THAT:

Beginning on or about October 3, 2021, and continuing through approximately November 21, 2021, in the State and Eastern and Western Districts of Wisconsin,

MONTAE D. JACOBS, A.K.A. "MAX," "CHEDDAR," "MILLY,"

knowingly persuaded, induced, enticed, and coerced AV-3, an adult female, to travel in interstate commerce to engage in prostitution and attempted to do so.

In violation of Title 18, United States Code, Section 2422(a).

FORFEITURE NOTICE

1. Upon conviction of one or more offenses in violation of Title 18, United States Code, Section 1591, set forth in Counts One through Four of this Indictment, the defendant, MONTAE D. JACOBS, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 1594(e)(1), any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the offense, and any property traceable to such property, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense. The property to be forfeited includes, but is not limited to, a sum of money equal to the proceeds obtained from the offense or offenses of conviction.

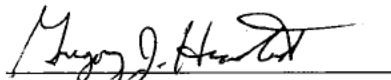
2. If any of the property described above, as a result of any act or omission by the defendant, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL:

[REDACTED]
FOREPERSON

Dated: _____

9/6/23



GREGORY J. HAANSTAD
United States Attorney